

EXHIBIT A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA

HAMILTON COUNTY EMERGENCY
COMMUNICATIONS DISTRICT,
et al.,

Plaintiffs,

vs.

BELLSOUTH
TELECOMMUNICATIONS, LLC,
d/b/a AT&T TENNESSEE,

Defendant.

CONSOLIDATED CASES:

1:11-CV-330
(Lead Case);
1:12-CV-003;
1:12-CV-056;
1:12-CV-131;
1:12-CV-138;
1:12-CV-139;
1:12-CV-149;
1:12-CV-166;
1:12-CV-176;
1:12-CV-186

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VIDEOTAPED 30(b)(6) DEPOSITION OF  
KATHERINE LOUISE REED

9:30 a.m.

October 30, 2013

1100 Peachtree Street, N.E.

Atlanta, Georgia

Christy L. Farrar, CCR-B-2178



1 Q. (By Mr. Greenholtz) I mean, to be removed  
2 from the exclusion list, you had to be present on the  
3 exclusion list, logically; is that right?

4 MR. BRESLIN: Form. Same objection.

5 THE WITNESS: I'm not aware of any list  
6 that stated the USOC PR71D.

7 Q. (By Mr. Greenholtz) Okay. PR71D is not  
8 one of the USOCs listed on Exhibit 18 here, is it, or  
9 is it?

10 A. No, it is not.

11 Q. Okay. You'll see in BR7, which is on page  
12 8 of 12, a reference to a zero rated USOC. What is a  
13 zero rated USOC?

14 A. The overall definition of a zero rated  
15 USOC is a USOC that carries a zero rate.

16 Q. What does that mean?

17 A. That means that there is no rate  
18 associated with that particular USOC.

19 Q. Okay. Meaning that it may be a service  
20 that is provided, but on the bill to the customer  
21 there's not a charge associated with it?

22 A. Correct.

23 Q. Okay. All right. And this says: To  
24 begin to include zero rated USOCs when calculating  
25 911 surcharges for all impacted products.



1                   What types of zero rated USOCs would BR7  
2 be referring to?

3           A.       BR7 is referring to we discovered some  
4 USOCs, some accounts that had special pricing  
5 arrangements.

6           Q.       Uh-huh.

7           A.       I'm not sure if you're familiar with the  
8 term special assemblies.

9           Q.       Sure. We're going to talk about them in  
10 just a moment, actually.

11          A.       Okay. We discovered that on some accounts  
12 that were carrying a special assembly USOC, which our  
13 analysis told us that the special assembly USOC was  
14 setting on that account to handle the billing.

15          Q.       Okay.

16          A.       And that the tariff USOC setting on that  
17 account were zero rated. During our analysis, we  
18 discovered that in those types of situation, we were  
19 inadvertently suppressing the 911 surcharge.

20          Q.       Okay.

21          A.       So once we found it, we fixed it with this  
22 project.

23          Q.       Okay. When did you find the discrepancy?

24          A.       It was -- I can't give you an exact date.  
25 It was probably sometime third, fourth quarter of



1 2010, because this project team was already formed  
2 and we were beginning to, you know, define our  
3 business requirements.

4 Q. Okay.

5 A. And that's when we discovered the issue.

6 Q. Okay. So it was the project team in  
7 relation to the multiplex billing arrangements that  
8 had been formed and that project team discovered the  
9 discrepancy here with the zero rated USOCs -- excuse  
10 me, with the special assembly USOCs?

11 A. Yes. Based on my recollection, that is  
12 true.

13 Q. Okay.

14 A. A true statement.

15 Q. Who was the head of the project team?

16 A. Gianni Walkey.

17 Q. Okay. I think, for the record, his first  
18 name is spelled G-i-a-n-n-i?

19 A. I believe that's correct, yes.

20 Q. That's a test on my part. Okay.

21 All right. So it came to light that there  
22 were, I guess, to summarize, that there were accounts  
23 that should have been billed a 911 surcharge, but  
24 because of the non-tariff USOCs that had been  
25 associated with the account, the 911 surcharge had

